



**Phillips Lytle LLP**

**Via ECF**

February 19, 2024

Hon. Michael J. Roemer  
United States District Court  
Robert H. Jackson United States Courthouse  
2 Niagara Square  
Buffalo, New York 14202

Re: *Grand'Maison, M.D. v. Roswell Park Comprehensive Cancer Center, et al.*  
Case No. 1:23-cv-00099

Dear Judge Roemer:

We represent the Defendants and write pursuant to your local rules regarding discovery disputes. Defendants are requesting the Court's assistance in resolving their request for Plaintiff to produce responsive documents and revised interrogatory responses in this case.

By way of background, Defendants served Plaintiff with a First Request for Production of Documents and First Set of Interrogatories on May 24, 2023. Plaintiff responded to those demands on June 23, 2023 and July 5, 2023, respectively. In these responses, Plaintiff noted she would produce "all non-privileged, non-objectionable, relevant documents responsive to the Defendants' document requests;" however, no documents were in fact produced. Defendants demanded Plaintiff produce these documents and accompanying privilege log again on August 21, 2023 and most recently on January 29, 2024. To date, Plaintiff has not produced a single document since commencing this action against the Defendants on January 31, 2023.

Defendants also wrote to Plaintiff regarding deficiencies in her interrogatory responses, setting a deadline for responses on February 14, 2024. Defendants have not received any amended or supplemental interrogatory responses.

ATTORNEYS AT LAW

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Alternatively, Defendants request permission to file a motion to compel regarding this dispute. Of note, under the current scheduling order (Dck. No. 42), motions to compel discovery are due by February 26, 2024.

Very truly yours,

Phillips Lytle LLP

A handwritten signature in black ink that reads "Amanda L. Lowe".

Amanda L. Lowe

ALL

cc: David E. Gottlieb, Esq. (via ECF and email)